

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

JOINT MOTION TO EXTEND TIME

Defendants Executive Director Kevin Guthrie (“FDEM”), Secretary Kristi Noem, and Acting Director Todd Lyons; Plaintiffs Friends of the Everglades, Inc. and the Center for Biological Diversity; and Intervenor-Plaintiff the Miccosukee Tribe of Indians, respectfully move to extend Defendants’ deadline to respond to Plaintiffs’ and Intervenor-Plaintiff’s complaints and for the parties to submit a Rule 26(f) report, to the extent one is required. There is good cause to grant the motion because Plaintiffs intend to amend their complaint once a required 60-day notice period expires. Doc. 1 ¶ 53; Doc. 32 at 18; Doc. 38. Accordingly, it is more efficient for the Parties to respond to the complaints and to conduct a Rule 26(f) conference once all parties have been joined and all claims have been raised.

For the foregoing reasons, the Parties respectfully request that the Court extend the deadline to respond to Plaintiffs’ and Intervenor-Plaintiff’s complaints until October 27, 2025, and extend the deadline for the Parties to submit a Rule 26(f) report, to the extent one is required, until after Plaintiffs’ forthcoming amended complaint.

Counsel for FDEM has conferred by email and telephone with Plaintiffs, Intervenor-Plaintiff, and the Federal Defendants. All agree to the relief sought in this motion.

FDEM previously moved to extend its time to respond to Plaintiffs' original complaint to align its deadline with the Federal Defendants' deadline. Doc. 39. This Court granted FDEM's motion and extended FDEM's deadline to August 26, 2025. Doc. 44. No other extensions have been requested.

Dated: August 22, 2025

James Uthmeier
Attorney General of Florida
Jeffrey Paul DeSousa (FBN 110951)
Acting Solicitor General
Nathan A. Forrester (FBN 1045107)
Chief Deputy Solicitor General
Robert S. Schenck (FBN 1044532)
Assistant Solicitor General
Office of the Attorney General
The Capitol, PL-01
Tallahassee, FL 32399
jeffrey.desousa@myfloridalegal.com

Respectfully submitted,

s/ Jesse Panuccio
Jesse Panuccio (FBN 31401)
Evan Ezray (FBN 1008228)
David Costello (FBN 1004952)
BOIES SCHILLER FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, Florida 33301
jpanuccio@bsfllp.com

*Counsel for Kevin Guthrie, in his official
capacity as Executive Director of the Florida
Division of Emergency Management*

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2025, the foregoing was filed with the Clerk of Court using CM/ECF, which will serve a Notice of Electronic Filing on all counsel of record.

s/ Jesse Panuccio
Jesse Panuccio